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Attorneys for Defendants
Tile, Inc. and Life360, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHANNON IRELAND-GORDY and
STEPHANIE IRELAND GORDY,
individually and on behalf of all others
similarly situated.

Plaintiffs.

V.

TILE, INC., LIFE360, INC., and
AMAZON.COM, INC..

Defendants.

Case No. 3:23-CV-04119-AMO

**DECLARATION OF JEFFREY M.
GUTKIN IN SUPPORT OF THE
PARTIES' STIPULATION AND
[PROPOSED] ORDER CONTINUING
INITIAL CASE MANAGEMENT
CONFERENCE AND DEFENDANTS'
DEADLINE TO RESPOND TO
COMPLAINT**

Date Action Filed: 08/14/2023

1 I, Jeffrey M. Gutkin, declare as follows:

2 1. I am an attorney with the law firm Cooley LLP, licensed to practice in the State of
 3 California. I represent Tile, Inc. and Life360, Inc. in the above-captioned matter. I have personal
 4 knowledge of the following facts and if called to testify, could and would competently testify
 5 thereto.

6 2. I submit this declaration in accordance with Rule 6-2(a) of the civil Local Rules for
 7 the United States District Court for the Northern District of California.

8 3. On August 14, 2023, Shannon Ireland-Gordy and Stephanie Ireland Gordy
 9 (“Plaintiffs”) filed a putative class action complaint (the “Complaint”) against Tile, Inc., Life360,
 10 Inc., and Amazon.com, Inc. (“Defendants”; with Plaintiffs, the “Parties”) (ECF No. 1).

11 4. The Court scheduled an Initial Case Management Conference for November 16,
 12 2023 (the “Initial CMC”) (ECF No. 9).

13 5. On September 16, 2023, Tile, Inc., Life360, Inc. and Plaintiffs stipulated to extend
 14 the Tile, Inc. and Life360, Inc.’s deadline to respond to the Complaint to November 7, 2023 (ECF
 15 No. 20). The stipulation extending Tile, Inc. and Life360, Inc.’s deadline to respond to the
 16 Complaint is the only time modification the Parties have stipulated to in this case. The Court has
 17 ordered no time modifications.

18 6. The Parties have met and conferred and wish to engage in private mediation to
 19 explore a mutually-agreeable resolution of the claims in the Complaint that would render further
 20 litigation unnecessary. The Parties agree that, in an effort to preserve the Parties’ and the Court’s
 21 resources, and to accommodate possible early resolution, the Initial CMC should be continued by
 22 approximately four months and Defendants’ deadlines to respond to the Complaint should be
 23 vacated while mediation is attempted.

24 7. If granted, the requested relief would continue the Initial CMC in this matter by four
 25 or more months and would vacate Defendants’ deadline to respond to the Complaint, which
 26 deadline would be reset by agreement of the Parties or Court order.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd
2 day of October 2023.

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4 /s/ *Jeffrey M. Gutkin*
5 Jeffrey M. Gutkin
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